

1 Tionna Dolin (SBN 299010)
2 Email: tdolin@slpattorney.com
3 **STRATEGIC LEGAL PRACTICES, APC**
4 1888 Century Park East, Floor 19
Los Angeles, California 90067
Telephone: (310) 929-4900
Facsimile: (310) 943-3838

5 Attorneys for Plaintiffs
6 RICHARD FLIER and PATRICIA FLIER

7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**

9 RICHARD FLIER and PATRICIA
FLIER,

10 Plaintiffs,

11 v.

12 FCA US, LLC; and DOES 1 through 10,
13 inclusive

14 Defendants.
15
16

Case No. 3:21-cv-02553-CRB

**Request for Entry of Judgment
Pursuant to FRCP 68(a)**

[Complaint Filed: April 08, 2021]

1 **TO THE HONORABLE COURT AND ALL PARTIES AND THEIR**
2 **ATTORNEYS OF RECORD:**

3
4 **PLEASE TAKE NOTICE** Plaintiffs RICHARD FLIER and PATRICIA
5 FLIER accepted Defendant FCA US, LLC's Offer of Judgment Pursuant to Fed.
6 R. Civ. P. 68 on January 24, 2023, which is attached hereto as **Exhibit 1**. Plaintiffs
7 hereby apply for the entry of judgment thereon pursuant to the terms of the Rule
8 68 attached herein.

9
10 Dated: February 8, 2023

STRATEGIC LEGAL PRACTICES, APC

11
12 

13 TIONNA DOLIN
14 Attorney for Plaintiffs
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I, the undersigned, declare that I am over the age of 18 and am not a party to this action. I am employed in the City of Los Angeles, California; my business address is Strategic Legal Practices, A Professional Corporation at 1888 Century Park East, 19th Floor, Los Angeles, California 90067.

On the date below, I served a copy of the foregoing document entitled:

Request for Entry of Judgment Pursuant to FRCP 68(a)

on the interested parties in said case as follows:

Served Electronically Via the Court's CM/ECF System

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. I declare that I am employed in the office of a member of the Bar of this Court, at whose direction the service was made. This declaration is executed in Los Angeles, California on February 8, 2023.



Miguel Chavez